

EXHIBIT 1

Page 1		Page 2	
1	UNITED STATES DISTRICT COURT	1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA	2	NORTHERN DISTRICT OF CALIFORNIA
3	SAN FRANCISCO DIVISION	3	SAN FRANCISCO DIVISION
4		4	
5	In re TWITTER INC. SECURITIES LITIGATION	5	In re TWITTER INC. SECURITIES LITIGATION
6	This Document Relates To:	6	This Document Relates To:
7	ALL ACTIONS.	7	ALL ACTIONS.
8	Case No. 3:16-cv-05314-JST (SK)	8	Case No. 3:16-cv-05314-JST (SK)
9	CLASS ACTION	9	CLASS ACTION
10	AMENDED NOTICE OF DEPOSITIONS TO NON-PARTIES	10	AMENDED NOTICE OF DEPOSITIONS TO NON-PARTIES
11		11	
12		12	
13	***CONFIDENTIAL***	13	
14	VIDEOTAPED DEPOSITION OF CELIA POON	14	
15	San Francisco, California	15	Confidential Videotaped Deposition of CELIA
16	February 1, 2019	16	POON, Volume I, taken on behalf of Plaintiffs, at
17	VOLUME I	17	One Montgomery Street, San Francisco, California,
18		18	beginning at 9:12 a.m. and ending at 5:11 p.m. on
19		19	Friday, February 1, 2019, before JOHNNA PIPER,
20		20	Certified Shorthand Reporter No. 11268.
21		21	
22	REPORTED BY:	22	
23	JOHNNA PIPER	23	
24	CSR 11268	24	
25	Job No. 10050810	25	
Page 3		Page 4	
1	APPEARANCES:	1	I N D E X
2	For Plaintiffs:	2	WITNESS EXAMINATION
3	Robbins, Geller, Rudman & Dowd, LLP	3	Celia Poon
4	655 West Broadway, Suite 1900	4	
5	San Diego, California 92101	5	By Mr. Drosman
6	(619) 231-1058	6	
7	ddrosman@rgrdlaw.com	7	EXHIBITS
8	By: Daniel S. Drosman, Esq.	8	PLAINTIFFS' PAGE
9	Christopher Kinnon, Esq.	9	Exhibit 197 Celia Poon's LinkedIn page 35
10		10	Exhibit 198 Job description for Sr. Finance 45
11	Lead Counsel for Lead Plaintiff and the Class:	11	Manager, Corporate FP&A
12		12	
13	Motley Rice LLC	13	Exhibit 199 E-mail from Cassandra Fenley to 79
14	28 Bridgeside Boulevard	14	kbessinger@twitter.com, et al.,
15	Mt. Pleasant, South Carolina 29464	15	dated 1/12/2015, subject: Updated
16	(843) 216-9000	16	invitation: Monthly metrics
17	mweatherby@motleyrice.com	17	review @ Tue Jan 20, 2015 5pm -
18	by: Meredith B. Weatherby, Esq.	18	6pm (Krista Bessinger),
19		19	Bates-stamped TWTR_SHEN_00094095
20		20	
21	For the Defendants:	21	Exhibit 200 E-mail from Kenney Deng to Celia 87
22		22	Poon, et al., dated 1/19/2015,
23	Cooley LLP	23	subject: Metrics review 1/20
24	3175 Hanover Street	24	preliminary deck, with
25	Palo Alto, California 94304-1130	25	attachments, Bates-stamped
	(650) 843-5228		TWTR_SHEN_00259502
	jvs@cooley.com		Exhibit 201 E-mail from Celia Poon to Anthony 94
	By: Jessica Valenzuela Santamaria, Esq.		Noto, et al., dated 10/31/2014,
	Brett De Jarnette, Esq.		subject: OpComm meeting -
			disclosure metrics, with
			attachment, Bates-stamped
			TWTR_SHEN_00203897
	Also Present:		
	Michele Lee, Twitter		Exhibit 202 E-mail string beginning with 102
	Terry Koelbl, Robbins, Geller, Rudman &		e-mail from Kenney Deng to
	Dowd, LLP		Anthony Noto, et al., dated
	David Manzo, Videographer		10/31/2014, subject: Re: OpComm
			meeting - disclosure metrics,
			with attachment, Bates-stamped
			TWTR_SHEN_00259313 through 15,
			TWTR_SHEN_00259316.0001 through
			10

<p style="text-align: right;">Page 261</p> <p>1 BY MR. DROSMAN:</p> <p>2 Q. Well, you told me earlier that you</p> <p>3 understood the purpose of analyst day, right?</p> <p>4 A. Yes.</p> <p>5 Q. What's the purpose of analyst day?</p> <p>6 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>7 Asked and answered.</p> <p>8 THE WITNESS: The purpose of analyst day is</p> <p>9 to show the financial opportunity externally.</p> <p>10 BY MR. DROSMAN:</p> <p>11 Q. What do you mean by "externally"?</p> <p>12 A. It could be to investors; it could be to</p> <p>13 analysts.</p> <p>14 Q. Externally means to the public, right?</p> <p>15 A. Correct.</p> <p>16 Q. It's fair to say Mr. Noto presented these</p> <p>17 slides at analyst day to the public, right?</p> <p>18 A. That's correct.</p> <p>19 Q. Okay. Let's take a look at page ending</p> <p>20 004. Do you see the heading on that page is "Major</p> <p>21 Growth Drivers," right?</p> <p>22 A. I see that.</p> <p>23 Q. And you were involved in selecting these</p> <p>24 eight metrics as major growth drivers, correct?</p> <p>25 MS. VALENZUELA SANTAMARIA: Objection.</p>	<p style="text-align: right;">Page 262</p> <p>1 Vague and ambiguous and lacks foundation.</p> <p>2 THE WITNESS: I was involved in putting</p> <p>3 together the financial model that put together these</p> <p>4 numbers that I see on the -- on this slide.</p> <p>5 BY MR. DROSMAN:</p> <p>6 Q. Okay. Who chose the major growth drivers</p> <p>7 to present on this slide?</p> <p>8 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>9 Vague and ambiguous and mischaracterizes the</p> <p>10 document.</p> <p>11 THE WITNESS: Anthony Noto.</p> <p>12 BY MR. DROSMAN:</p> <p>13 Q. How do you know that?</p> <p>14 A. We worked with him to build the model.</p> <p>15 Q. Okay. And one of the listed major growth</p> <p>16 drivers is 48 percent top 20 markets DAU over MAU</p> <p>17 ratio, correct?</p> <p>18 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>19 Mischaracterizes the document; vague and ambiguous.</p> <p>20 THE WITNESS: I can -- I can read the</p> <p>21 48 percent DAU MAU here.</p> <p>22 BY MR. DROSMAN:</p> <p>23 Q. That's listed is one of the eight major</p> <p>24 growth drivers, correct?</p> <p>25 MS. VALENZUELA SANTAMARIA: Objection.</p>
<p style="text-align: right;">Page 263</p> <p>1 Mischaracterizes the document and vague and</p> <p>2 ambiguous.</p> <p>3 THE WITNESS: Yes. This is one of the</p> <p>4 drivers that is part -- is the -- an input to the</p> <p>5 model.</p> <p>6 BY MR. DROSMAN:</p> <p>7 Q. What model?</p> <p>8 A. The financial model that gets to the</p> <p>9 revenue that you see in the other slides. I don't</p> <p>10 know which page. I'm flipping. Slides 019 -- 0019.</p> <p>11 Q. Where it says "Summary of Growth</p> <p>12 Opportunities"? Is that what you're referring to?</p> <p>13 A. That's correct.</p> <p>14 Q. Well, just a matter of fact that the top 20</p> <p>15 markets DAU to MAU ratio was listed as one of the</p> <p>16 major growth drivers on page ending 004, correct?</p> <p>17 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>18 Mischaracterizes the document and vague and</p> <p>19 ambiguous.</p> <p>20 THE WITNESS: The assumption 48 percent</p> <p>21 goes into the model that gets to this \$11.4 billion.</p> <p>22 That -- that's why it is listed on the page -- on</p> <p>23 004.</p> <p>24 BY MR. DROSMAN:</p> <p>25 Q. Yeah. I'm not asking you why. I'm just</p>	<p style="text-align: right;">Page 264</p> <p>1 asking you whether 48 percent top 20 markets DAU</p> <p>2 over MAU ratio was listed as a major growth driver</p> <p>3 on page ending 004.</p> <p>4 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>5 Asked and answered; mischaracterizes the document</p> <p>6 and vague and ambiguous.</p> <p>7 THE WITNESS: This number is part of the</p> <p>8 model to drive the company into the 11.4 billion</p> <p>9 revenues.</p> <p>10 MR. DROSMAN: Move to strike as</p> <p>11 nonresponsive.</p> <p>12 Q. Ma'am, is 48 percent top 20 markets DAU</p> <p>13 over MAU ratio listed as one of the eight major</p> <p>14 growth drivers on page ending 004?</p> <p>15 MS. VALENZUELA SANTAMARIA: Objection.</p> <p>16 Asked and answered; mischaracterizes the document</p> <p>17 and vague and ambiguous.</p> <p>18 THE WITNESS: It's -- it's listed as one of</p> <p>19 the input on slide on 004.</p> <p>20 BY MR. DROSMAN:</p> <p>21 Q. And it's listed as one of the four inputs</p> <p>22 on the slide ending 019, right?</p> <p>23 A. It's not four. There's a -- it's more than</p> <p>24 four there.</p> <p>25</p>

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1 Q. Do you understand my question? Perhaps
2 you're missing me. Do you understand my question?
3 A. I understand your question, and I already
4 answered your question.
5 Q. I don't think you understand my question
6 because you haven't answered it. My question is
7 just isolated to text, and we previously read text
8 on page ending 908, if you could follow along with
9 any. "DAUs and DAU as a percent of MAU are measures
10 of our user engagement." Okay? Are you with me so
11 far?
12 A. I read that's what you said.
13 Q. Okay. So my question is anywhere on page
14 ending 909 does it say the words "ad engagements are
15 a measure of our user engagements"? Does it say
16 those words on page ending 909?
17 MS. VALENZUELA SANTAMARIA: Objection. The
18 document speaks for itself and is also asked and
19 answered multiple times.
20 THE WITNESS: The engage -- the -- under ad
21 engagement, "The engagements include billable clicks
22 to expand, retreat, comment, install, or favorite is
23 a subset of user engagement."
24 BY MR. DROSMAN:
25 Q. So you're not going to answer my

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1 (TIME NOTED: 5:11 p.m.)
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1 question -- I'll move to strike that as
2 nonresponsive.
3 You're not going to answer my question?
4 A. I already --
5 MS. VALENZUELA SANTAMARIA: Objection.
6 Mischaracterizes testimony as the witness has
7 already answered the question now I think it's six
8 times.
9 THE WITNESS: I already answered your
10 question.
11 BY MR. DROSMAN:
12 Q. You haven't, ma'am, but I'm not going to
13 ask it again because apparently you won't answer it,
14 so we'll go ahead and conclude the deposition.
15 MR. DROSSMAN: Unless you have questions.
16 MS. VALENZUELA SANTAMARIA: I don't have
17 any. I think I do -- before we go off the record, I
18 want to make sure the transcript is designated
19 confidential under the protective order.
20 THE COURT REPORTER: And do you want a copy
21 of the transcript?
22 MS. VALENZUELA SANTAMARIA: Yes, please.
23 THE VIDEOGRAPHER: This concludes today's
24 proceedings. Total number of media units used was
25 seven. We're off the record at 5:11 p.m.

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1 CERTIFICATE OF REPORTER
2 I, JOHNNA PIPER, a Certified Shorthand
3 Reporter, hereby certify that the witness in the
4 foregoing deposition was by me duly sworn to tell
5 the truth, the whole truth, and nothing but the
6 truth in the within-entitled cause;
7 That said deposition was taken in shorthand
8 by me, a disinterested person, at the time and place
9 therein stated, and that the testimony of the said
10 witness was thereafter reduced to typewriting, by
11 computer, under my direction and supervision;
12 That before completion of the deposition,
13 review of the transcript [X]was []was not
14 requested. If requested, any changes made by the
15 deponent (and provided to the reporter) during the
16 period allowed are appended hereto.
17 I further certify that I am not of counsel
18 or attorney for either or any of the parties to the
19 said deposition, nor in any way interested in the
20 event of this cause, and that I am not related to
21 any of the parties thereto.
22 DATED: FEBRUARY 18TH, 2019
23
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JOHNNA PIPER, CSR NO. 11268